

# EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**STATE OF TENNESSEE, and  
TENNESSEE BUREAU OF  
INVESTIGATION,**

**Defendants.**

**Case No. 2:24-cv-2101**

**CHIEF JUDGE LIPMAN**

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**PLAINTIFF UNITED STATES OF AMERICA’S SECOND SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS AND FIRST SET OF INTERROGATORIES  
DIRECTED TO DEFENDANTS STATE OF TENNESSEE AND TENNESSEE BUREAU  
OF INVESTIGATION**

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The United States propounds the following Second Set of Requests for Production (“Requests”) and First Set of Interrogatories (“Interrogatories”) on the State of Tennessee and Tennessee Bureau of Investigation pursuant to Federal Rules of Civil Procedure 26, 33, and 34.

**DEFINITIONS**

1. The words “you,” “yours,” “yourselves,” and “the State” refer to the State of Tennessee and Tennessee Bureau of Investigation (TBI), including its departments, agencies, boards, bureaus, commissions, councils, and agents.

2. A variant of any defined term (*e.g.*, “your” is a variant of “you”) shall have the appropriate contextual meaning. The singular shall include the plural and vice versa; the terms

20. Produce all documents or communications related to HIV and HIV transmission in Tennessee that you may use in your defense of this litigation.

21. Produce all documents that the Tennessee General Assembly considered pertaining to its passage of Senate Bill 181/House Bill 1384 and any amendments to those bills prior to Senate Bill 181's passage.

22. Produce all documents relied upon to respond to any Interrogatory.

23. To the extent not produced in response to the foregoing requests, produce all documents and communications you may use to support your defense of this litigation.

### **INTERROGATORIES**

1. **Interrogatory No. 1:** Identify each person or entity who has knowledge of the facts or information relevant to the subject matter of the allegations in the Complaint or your defenses to the Complaint; and for each person or entity so identified, provide a summary of the knowledge you understand that person or entity to possess.

2. **Interrogatory No. 2:** From 1991 to the present, identify all State entities, including departments, agencies, boards, bureaus, commissions, councils, and agents, that have enforced, implemented, administered, or otherwise engaged in any activities, or continue to take any of these actions, related to the Aggravated Prostitution statute or associated penalties for Aggravated Prostitution. Include any entities that have maintained or continue to maintain any records, or that have published or continue to publish any information regarding an individual's Aggravated Prostitution conviction or designation as a sexual offender.

14. **Interrogatory No. 14:** From 1991 to the present, identify all individuals required to register under TN-SORA solely for Aggravated Prostitution for whom TDOC, BOPP or TBI has ever served as the registering agency, including indication of which State agency or agencies supervised the individual and all dates of supervision by the State agency or agencies.

15. **Interrogatory No. 15:** From 1991 to the present, identify all individuals who were incarcerated by TDOC or any other state facility for an Aggravated Prostitution conviction, including the dates in which they were held in TDOC or state custody.

16. **Interrogatory No. 16:** Identify all individuals for whom TBI has granted a request for termination, according to the terms of the settlement agreement filed in Civil Action No. 2:23-CV-2670, and for each individual identify whether and when TBI (a) has removed the terminated registrant from the public-facing website; (b) has updated the registry database to reflect the registrant's termination; and (c) has mailed a letter confirming termination to the registrant along with the form for requesting removal of the sex offender license designation from the Tennessee Department of Safety and Homeland Security.

17. **Interrogatory No. 17:** Identify any individuals who, since July 1, 2024, have requested termination according to the terms of the settlement agreement filed in Civil Action No. 2:23-CV-2670, but for whom termination has not been granted, and explain why.

18. **Interrogatory No. 18:** Identify all individuals within the TBI who, in any capacity, participate in the administration, operation, maintenance, enforcement or oversight of Tennessee's sex offender registry or enforcement of the Aggravated Prostitution statute or are otherwise authorized to do so, including all individuals within TBI's Criminal Intelligence Unit.

For each person identified, describe their role in doing so in detail and the dates serving in this role.

19. **Interrogatory No. 19:** Prior to July 1, 2024, describe and explain the policies and processes by which the Tennessee Department of Safety and Homeland Security determine which individuals should be issued a driver's license or identification card with a designation that they are a sexual offender, and how they implement that requirement; and determine when individuals' sexual offender designation on their driver's license or identification card should be removed, and how they implement that requirement.

20. **Interrogatory No. 20:** Identify all individuals for whom the Tennessee Department of Safety and Homeland Security has at any time prior to July 1, 2024, issued a driver's license or identification card with a designation that they are a sexual offender solely because of a conviction for aggravated prostitution.

21. **Interrogatory No. 21:** Identify all individuals for whom the Tennessee Department of Safety and Homeland Security has, at any time after July 1, 2024, issued a driver's license or identification card removing a prior designation that the individual was a sexual offender, and for whom that designation was previously added solely as a result of a conviction for Aggravated Prostitution.

22. **Interrogatory No. 22:** Identify all persons providing information or otherwise assisting, in whole or in part, in the preparation of the answers to these Requests and Interrogatories, or overseeing the collection of documents responsive to the Requests. For each such person, identify the specific Request or Interrogatory that they assisted in answering.

Dated: September 13, 2024

REBECCA B. BOND  
Chief

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